

Message

From: Riley - CDPHE, Stephen [stephen.riley@state.co.us]
Sent: 7/16/2019 4:26:12 PM
To: Stahnke, Graham [gstahnke@akaenergy.com]
CC: Ostrand, Laurie [Ostrand.Laurie@epa.gov]; Wilwerding, Joseph [Wilwerding.Joseph@epa.gov]; Hinkley, Ethan [Ehinkley@redcedargathering.com]; Bryant, Coy [cbryant@redcedargathering.com]; Frazier, Virgil [vfrazier@sugf.com]; Quiroz, Rudy [rquiroz@akaenergy.com]
Subject: Re: [EXTERNAL] Re: LDAR OOOOa/Reg 7 Regulatory Discussion

Thank you for the clarification Graham.

Steve Riley
Environmental Protection Specialist
Oil and Gas Team



COLORADO
Air Pollution Control Division
Department of Public Health & Environment

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Are you curious about ground-level ozone in Colorado? Visit our [ozone webpage](#) to learn more.

On Mon, Jul 15, 2019 at 5:01 PM Stahnke, Graham <gstahnke@akaenergy.com> wrote:

Hi Steve,

Our goal is to continue our open dialogue with CDPHE and EPA and continue to improve our LDAR program and practices. We've faced a number of challenges over the past six (6) months with the shift in the leak definition from 10,000 to 500 ppm as well as a large increase in our component counts over the past year. We have required engineering and design resources to repair leaks or replace leaking components due to the facility being regulated under OSHA's PSM program and in a few cases this has necessitated work taking longer than 15 days to complete these steps while ensuring process integrity and safety elements. If there are other folks in your group who have expertise in these areas and the best way to handle them we would welcome their input.

Thanks,

Graham

Graham Stahnke, PE, CSP

Sr. Environmental Compliance Specialist



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From: Riley - CDPHE, Stephen <stephen.riley@state.co.us>
Sent: Monday, July 15, 2019 3:53 PM
To: Stahnke, Graham <gstahnke@akaenergy.com>
Cc: Ostrand, Laurie <Laurie@epa.gov>; Wilwerding, Joseph <Joseph@epa.gov>; Hinkley, Ethan <Ehinkley@redcedargathering.com>; Bryant, Coy <cbryant@redcedargathering.com>; Frazier, Virgil <vfrazier@sugf.com>
Subject: [EXTERNAL] Re: LDAR OOOOa/Reg 7 Regulatory Discussion

Graham,

I was wondering if you could provide any more details regarding the discussion topics. I just want to see if it would be appropriate for other members of the Air team to be a part of the discussion.

Thank you,

Steve Riley
Environmental Protection Specialist
Oil and Gas Team



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On Mon, Jul 15, 2019 at 10:45 AM Stahnke, Graham <gstahnke@akaenergy.com> wrote:

Hi Laurie and Steve,

We would like to setup a teleconference to discuss compliance with LDAR under Reg 7 and OOOO/OOOOa and a few questions our operations group has had recently. Please let me know if you have any availability this week.

Thanks,

Graham

Graham Stahnke, PE, CSP

Sr. Environmental Compliance Specialist



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